



## Memorandum

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**To:** Brent Johnson (KBJW)  
**From:** Lynn Klappich (DAA)  
**Date:** April 29, 2022  
**Project Name:** Green Ridge Recycling and Disposal Facility  
**Project Number:** 18020117-110102  
**Subject:** JPA response - Miller Lane Realignment  
**cc:** David Kwasniewski (KBJW), William Shewmake (Woods Rogers), Wendy Karably (DAA)

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This memorandum has been prepared as a response to one part (Item 3) of Comment #1 from the Additional Information Request Letter from the Virginia Department of Environmental Quality (DEQ), dated January 26, 2022, regarding the Joint Permit Application (JPA) number 20-1619 for the above referenced facility.

**JPA Comment 1 – Item 3: *“Please describe the onsite measures used to avoid or minimize impacts associated with the Miller Lane relocation which now results in surface water impacts that were not previously identified.”***

**Response:** The Miller Lane relocation was first considered in 2018 when Green Ridge Recycling and Disposal, LLC was just beginning to consider the layout of the landfill, access road and road relocations. The relocation was a concept graphic only and not based on any design work at that time.

In January 2020, when the Part A was submitted to DEQ, the Near Vicinity Map included the realignment as shown on the following FIGURE 1. On FIGURE 1, two key elements are included: the brown area, which is the disposal unit boundary; and the green line, which represents the Waste Management Boundary within which disposal and leachate management can occur under the landfill permit.

The realignment was slightly modified to meet VDOT alignment standards in the initial JPA September 2, 2020 submittal and the May 7, 2021 JPA response concept design drawings. (FIGURE 2)



FIGURE 1 – PART A – NEAR VICINITY MAP - 2020  
LAYOUT OF MILLER LANE  
RELOCATION/REALIGNMENT



FIGURE 2 – JPA – CONCEPT DESIGN DRAWINGS

However, during preparation of our response to VDEQ on the Part A application in 2021, it was determined that the distance between the disposal unit boundary (brown shading) and the waste management boundary (green line) had to be increased to allow for various aspects of future landfill infrastructure (e.g. power lines, gas lines etc.). This impacted the location of the Miller Lane relocation. In addition, the relocation provided a wider buffer from the edge of Miller Lane to landfill operations.

In addition, the intersection of Miller Lane and Pine Grove Road had to be modified after further discussions with VDOT. (e.g. elimination of the 'T' intersection, better flow for Pine Grove Road, greater radius on Miller Lane entering the intersection.).

Access was also needed to Miller Lane from adjoining parcel 44-A-23.

On October 1, 2021, a revised map was provided to VDEQ for the Part A application after further considering the layout and operations of the landfill. Below is a snippet from the 10/1/2021 figure illustrating the relocation of Miller Lane to the outer edge of the Green Ridge property. (FIGURE 3) This alignment was also included in the January 11, 2022 design drawings submitted in response to DEQ comments on the JPA (FIGURE 4).

The Part A and JPA drawings are now consistent. Note that the impact to wetlands is 0.023 acres, well below the 2 acre maximum allowed for landfills and the stream impact is approximately 1% of the total impacts. We believe there is adequate justification for the impacts based on the landfill design and Part A permit requirements as well as VDOT standards.



FIGURE 3 – PART A 2021 LAYOUT OF MILLER LANE RELOCATION



FIGURE 4 – JPA - 2022 LAYOUT OF MILLER LANE RELOCATION